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 Counsel for United States

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	2:12-CR-214-KJD-(PAL)
	)	
Plaintiff,	)	
	)	
v.	)	Unopposed Motion to Continue the Date to
	)	Respond to TRNSX.NET LLC's Petition for
MICHAEL A. FELS,	)	Hearing and to Continue the Hearing
	)	
Defendant.	)	

The United States of America respectfully moves this Court to continue the date to respond to TRNSX.NET LLC's petition for hearing and to continue the hearing. On August 18, 2016, TRNSX.NET LLC petitioned this Court for a hearing to adjudicate its interest in forfeited property. The hearing on the petition "shall, to the extent practicable and consistent with the interest of justice, be held within thirty days of the filing of the petition." 21 U.S.C. § 853(n)(4). However, the sheer volume of evidence in this case will take more than 30 days to gather and organize and the government will not be prepared by September 17, 2016. The government requests the hearing on the petition be held after January 4, 2017.

The grounds to continue are as follows.

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1 On September 1, 2016, the government contacted TRNSX.NET LLC's counsel, Richard  
2 Barnett, to request a continuance to the date to respond to TRNSX.NET LLC's petition. Mr.  
3 Barnett consented to the continuance. Prior to conducting a hearing on the petition, this Court  
4 may permit the parties to conduct discovery in accordance with the Federal Rules of Criminal  
5 Procedure. Fed. R. Crim. P. 32.2(c)(1)(B). The government is in the process of gathering  
6 thousands of documents in several states and will require time to review, organize, and produce  
7 these documents in discovery.

8 This motion is not submitted solely for the purpose of delay or for any other improper  
9 purpose.

10 This Court should grant the unopposed motion to continue the date to respond to  
11 TRNSX.NET LLC's petition for hearing and to continue the hearing to after January 4, 2017.

12 DATED this 12th day of September, 2016.

13 DANIEL G. BOGDEN  
14 United States Attorney

15 /s/ Daniel D. Hollingsworth  
16 DANIEL D. HOLLINGSWORTH  
17 Assistant United States Attorney

18  
19 IT IS SO ORDERED:

20 

21 UNITED STATES DISTRICT COURT

22 DATED: \_ October 31, 2016 \_\_\_\_\_  
23  
24  
25  
26

**PROOF OF SERVICE**

A copy of the foregoing was served upon counsel of record via Electronic Filing on September 12, 2016, and by the below identified method of service:

US MAIL:

RICHARD M. BARNETT  
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/s/Michelle C. Lewis  
MICHELLE C. LEWIS  
Paralegal Specialist